

App. No. 09/682,094

In the Drawings:

Corrected Drawings are attached.

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#### **REMARKS - General**

By the above amendment, Applicants have amended the Abstract to emphasize the novelty of the invention.

Also, the Applicants have rewritten all claims to define the invention more particularly and distinctly so as to overcome the technical rejections and define the invention patentability over the prior art.

Likewise, the applicants have redrawn all figures and diagrams pertaining to the invention in order to abide by the Examiner's indications.

##### **Comments:**

The Examiner contends that Claims 23-44 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sheikh et al., U.S. Pat. #6,266,721 (hereinafter *Sheikh*) in view of Ku et al., U.S. Pat. #6,438,624 (hereinafter *Ku*). The foundation for this rejection lies primarily in the utilization of a common ground of well-known electronic devices, resources and components that are readily available in the market which are mentioned in the present invention, and that also are referred to in the two above-mentioned prior inventions, as mentioned and/or referred to by the examiner in great detail.

However, the Applicants respectively traverse, in the opinion of the Applicants, those above-mentioned inventions differ greatly from the present invention, both in concept and in the applications that they are overtly declared as being intended or most suitable for.

In the first case, Sheikh explicitly states in his disclosure, **BACKGROUND OF THE INVENTION** section:

##### **[START QUOTE]**

###### *1. Field of the Invention*

*The invention relates to fault tolerant computer systems. More specifically, the invention is directed to a system for providing remote access and control of server environmental management.*

##### **[END QUOTE]**

This invention mainly concerns itself with the field of environmental control of a special class or category of computers, namely, server computers, which are subject to very stringent performance, availability and reliability requirements, and as such this invention is mainly of interest for computer manufacturers that include servers among their line of products.

In the second case, Ku explicitly states in his disclosure, in the same category ("Field of the Invention") the following:

##### **[START QUOTE]**

*The present invention generally relates to electronic data communications and integrated circuits (ICs), and more particularly to a method of configuring input/output (I/O) expander addresses on a communications bus, to facilitate inter-IC communications among a plurality of I/O planars used in a computer system.*

##### **[END QUOTE]**

Ku further adds in the **SUMMARY OF THE INVENTION** section of his disclosure:

##### **[START QUOTE]**

*It is therefore one object of the present invention to provide improved communications between logic components such as processors, microcontrollers and input/output (I/O) devices.*

##### **[END QUOTE]**

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Further, this patent's disclosure also mentions (in the section "DESCRIPTION OF AN ILLUSTRATIVE EMBODIMENT"):

[START QUOTE]

*Service processor 52 may be a PowerPC processor having an I2C port providing a communications path for I/O devices such as modems, LAN adapters, permanent storage devices, televisions, etc.*

[END QUOTE]

It is obvious that this invention concerns itself with optimizing communications between standard electronic components and/or devices, and as such it potentially applicable to a wide and diverse range of applications.

In contrast, the present application states in the category "Field of the Invention":

[START QUOTE]:

*This invention relates to electrical control systems and more particularly to a serial transmission system for controlling peripheral electrical devices arranged in a network.*

[END QUOTE]:

The fact that the present invention also implements and/or implies the utilization of certain standard electronic parts, components, devices, and protocols, such as microprocessors, memory devices, buffer devices, the I2C bus, the I2C protocol, I/O expanders, planars, etc., some of which by virtue of its inherent characteristics, i.e. the I2C bus, lend themselves to certain advantages that *per se* contribute to the merits of the invention, do not automatically lead to the conclusion that, nor do they represent evidence of, having copied or imitated ideas found in the previous art, in this case U.S. Pat #6,266,721 by Sheikh et al, and Ku et al, U.S. Pat #6,438,624, both of which happen to mention or propose utilization of said standard electronic parts, components, devices, and protocols. On the contrary, such characteristics and inherent advantages of said components are common knowledge, and the merits of these inventions, and also of the present invention, resides in having found original and useful applications, either theoretical or practical, to such characteristics and advantages.

In view of the above reasoning, the Applicants would argue that it would not have been obvious to one skilled in the art to devise the particular architecture of the invention aimed at the particular field of application that the invention is intended and useful for; so the Applicant argues that the new claims are novel and unique.

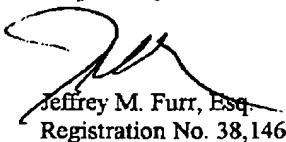
**Conclusion**

For all of the above reasons, applicant submits that the specification and claims are now in proper form, and that the claims all define patentability over, or in addition of, prior art. Therefore the applicant submits that this application is now in condition for allowance, which action is respectfully solicited.

**No New Art**

No new Art has been added to this application.

Respectfully submitted,



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I hereby certify I have transmitted this paper by fax to the Patent and Trademark Office to 703-872-9306 on 2005, June 02.

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